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## Accompanying Statement to Annual Certification of CPNI EB Docket 06-36 via ECFS

January 10, 2011

Company has not used CPNI except as included in 47 U.S.C. 222(d) exceptions.

- a) The Company has not sought customer approval of the use of CPNI since CPNI is not used.
- b) The Company has trained all personnel with access to CPNI as to the identification of CPNI and when CPNI may be used and has an express disciplinary process in place for any improper use of CPNI.
- c) The Company has not used CPNI in any sales or marketing campaign.
- d) No outbound sales and marketing campaign can be conducted without management approval and any such campaign would require supervisory review to assure compliance with the CPNI rules.

Signed

Daniel C. Becker

Daniel C. Becker

President

## Distribution:

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